

REMARKS

I. INTRODUCTION

Claims 1-6 are pending in the present application. In view of the following remarks, it is respectfully submitted that all of the presently pending claims are allowable.

II. THE 35 U.S.C. § 102(e) REJECTIONS SHOULD BE WITHDRAWN

Claims 1, 2, 4 and 6 stand rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent 6,317,835 to Bilger et al. ("the Bilger patent"). (See 4/14/05 Office Action, ¶ 3).

The Bilger patent describes a touch screen system for entry of encrypted and non-encrypted information. (See the Bilger patent, Abstract). The system consists of a touch sensor/screen 410, which utilizes a protocol command, "Input Mode Select," to toggle between a PIN entry mode and a clear mode. (See the Bilger patent, col. 5, lines 1-6). In the clear mode, the touch screen 410 displays a menu of choices to a user, and waits for the user to indicate a choice by touching the touch screen 410. (See the Bilger patent, col. 6, lines 10-14). When the user indicates a choice that would require insertion of a PIN (e.g., a purchase), the touch screen 410 enters the PIN entry mode by displaying a PIN pad. (See the Bilger patent, col. 6, lines 17-37). The PIN entered by the user is encrypted and forwarded to an application program, which forwards the information to a financial institution. The screen then displays the next menu for the user. (See the Bilger patent, col. 6, lines 59-67).

Claim 1 of the present invention recites a data-entry apparatus comprising "a device for entering data" and "*a display for displaying information confirming the security of the data-entry apparatus*" in combination with "an encryption circuit, communicatively coupled to the data-

entry device and the display.” As described in the specification, “[t]he device 1 may have a separate visible indicator for each type of data that a customer may enter. For example, a first icon may indicate a device 1 secure for PIN entry, while a second different icon may indicate that the device 1 is secure for signatures.” (See Specification, ¶ [0036]).

The Bilger patent does not disclose or suggest “a display for displaying information confirming the security of the data-entry apparatus,” as recited in claim 1. According to the Bilger patent, a PIN entry device accumulates several keystrokes before encrypting the PIN. (See the Bilger patent, col. 2, lines 22-25). The PIN entry device “waits for the ENTER key to be pressed and then performs an encryption algorithm on the accumulated inputs.” (Id. at col. 2, lines 25-26). However, the PIN entry device does not display information concerning its security. That is, after the PIN has been encrypted, the PIN entry device “displays the next menu for the user (encrypted or otherwise) [and] asks the T-PED to operate in the appropriate mode.” (Id. at col. 6, lines 65-67). Thus, the device described in the Bilger patent performs encryption without the knowledge of the user. There is no display or indication to the user beyond the display of the PIN pad. While this may be an encrypted mode, that information is not conveyed to the user.

The Examiner has stated that the Bilger patent discloses that the PIN entry device allows Clear Mode and Encrypted Mode, allowing the user to confirm the security of the PIN entry device. (See 4/14/05 Office Action, ¶ 13). The Bilger patent describes a process in which a computer sets the Input Mode Select command to “Select Clear Mode” and sends the command to the T-PED. (See the Bilger patent, col. 6, lines 10-11). The computer waits for user input, and after determining that an encrypted PIN is needed, “the computer informs the T-PED to enter encrypted PIN mode.” (See the Bilger patent, col. 6, lines 3-36). The computer displays a PIN pad and the T-PED enters encrypted PIN mode, at which time user input is received. (See the Bilger patent, col. 6, lines 37-44). It is respectfully submitted that at no point in the process does the user receive confirmation that the encrypted and clear modes are selected. The user only sees the screen change from a menu to a PIN pad, which is insufficient to indicate, by itself, that the

T-PED has entered the encrypted mode successfully. Therefore, it is respectfully submitted that the Bilger patent neither describes nor suggests "a display for displaying information confirming the security of the data-entry apparatus," as recited in claim 1. As such, Applicants respectfully request that the Examiner withdraw the rejection of claim 1.

It is respectfully submitted that claim 1 is not anticipated by the Bilger patent for the reasons discussed above and that this rejection should be withdrawn. Because claims 2-5 depend from and, therefore, include all of the limitations of claim 1, it is respectfully submitted that these claims are also allowable. Furthermore, it is respectfully submitted that independent claim 6, which includes substantially the same limitations as claim 1, including "displaying information asserting the data-entry device's ability to securely receive data," is allowable for at least the reasons discussed above with regard to claim 1.

III. THE 35 U.S.C. § 103(a) REJECTIONS SHOULD BE WITHDRAWN

The Examiner has rejected claim 3 under 35 U.S.C. § 103(a) as unpatentable over the Bilger patent in view of U.S. Patent 6,644,457 to White ("the White patent"). (See 4/14/05 Office Action, ¶ 9). The Examiner has rejected claim 5 under 35 U.S.C. § 103(a) as unpatentable over the Bilger patent in view of U.S. Patent 6,715,078 to Chasko et al. ("the Chasko patent"). (See 4/14/05 Office Action, ¶ 11).

It is respectfully submitted that claims 3 and 5, which depend from and include the limitations of claim 1, are not unpatentable over the Bilger patent in view of the White patent and the Chasko patent, respectively, for the reasons discussed above with regard to claim 1, and that these rejections should be withdrawn. Specifically, the Bilger patent does not disclose or suggest "a display for displaying information confirming the security of the data-entry apparatus," as recited in independent claim 1, from which claims 3 and 5 depend. Neither the White patent nor the Chasko patent cures these deficiencies of the Bilger patent. Therefore, claims 3 and 5 are also allowable.

CONCLUSION

In light of the foregoing, Applicants respectfully submit that all of the now pending claims are in condition for allowance. All issues raised by the Examiner having been addressed, and an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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